

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION, as  
*assignee of individuals who are Covered Persons,*  
JANE DOE-1, *a law enforcement officer*, JANE  
DOE-2, *a law enforcement officer*, EDWIN  
MALDONADO, SCOTT MALONEY,  
JUSTYNA MALONEY, PATRICK COLLIGAN,  
PETER ANDREYEV, and WILLIAM  
SULLIVAN,

Plaintiffs,

v.

INNOVATIVE WEB SOLUTIONS, LLC,  
RICHARD ROES 1-10, *fictitious names of*  
*unknown individuals* and ABC COMPANIES 1-  
10, *fictitious names of unknown entities*,

Defendants.

Case No.: 2:25-cv-01535

**RULE 7.1 DIVERSITY DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for Defendant INNOVATIVE WEB SOLUTIONS, LLC states that it is, and at the time of the commencement of this action was, a limited liability company whose members reside(d) in Minnesota and Colorado.

Dated: February 27, 2025

Respectfully Submitted,  
**GORDON, REES, SCULLY &  
MANSUKHANI LLP**

By: /s/ Clair E. Wischusen  
Clair E. Wischusen, Esq.  
Joseph Salvo, Esq. (*pro hac vice* forthcoming)  
John Mills, Esq. (*pro hac vice* forthcoming)  
Bianca Evans, Esq. (*pro hac vice* forthcoming)

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*Attorneys for Innovative Web Solutions, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2025, a true and correct copy of the foregoing Rule 7.1 Diversity Disclosure Statement was electronically filed with the Clerk of the District Court and served upon counsel for Plaintiffs at the following address of record via FedEx overnight mail, postage prepaid:

Rajiv D. Parikh, Esq.  
Jessica A. Merejo, Esq.  
Thomas R. Kraft, Esq.  
PEM Law LLP  
1 Boland Drive, Suite 101  
West Orange, NJ 07052

Dated: February 27, 2025

Respectfully Submitted,  
**GORDON, REES, SCULLY &  
MANSUKHANI LLP**

By: /s/ Clair E. Wischusen  
Clair E. Wischusen, Esq.